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10 *Attorneys for Defendant Western Progressive-Nevada, Inc. and Citibank, N.A., as Trustee of the*
11 *American Home Mortgage Investment Trust 2004-3, Mortgage Backed Notes, Series 2004-3*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 DIEGO M. GALIETTI, an individual,

Case No.: 2:21-cv-2034-APG BNW

15 Plaintiff,

**STIPULATION TO EXTEND
DEADLINE TO FILE RESPONSE TO
FIRST AMENDED COMPLAINT (FIRST
REQUEST)**

16 vs.

17 WESTERN PROGRESSIVE-NEVADA, INC.,
18 a Delaware Corporation; CITIBANK, N.A., as
19 Trustee of the American Home Mortgage
20 Investment Trust 2004-3, Mortgage Backed
21 Notes, Series 2004-3; and DOES I THROUGH
22 X inclusive; and ROE CORPORATION XX
23 through XXX, inclusive,

24 Defendants.

25 Plaintiff, Diego M. Galietti (“Plaintiff”), and Defendants Citibank, N.A., as Trustee of the
26 American Home Mortgage Investment Trust 2004-3, Mortgage Backed Notes, Series 2004-3
27 (“Citibank”); and Western Progressive-Nevada, Inc. (“Western Progressive”) (collectively
28 “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On May 10, 2022, Plaintiff filed his First Amended Complaint [ECF No. 38]. The deadline
for Defendants to file an Answer or responsive pleading is May 24, 2022. The Parties have
discussed extending the deadline for Defendants to file an Answer or responsive pleading to allow
for better investigation of the allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Citibank and

1 Western Progressive to file an Answer or responsive pleading to the First Amended Complaint to
2 June 17, 2022.

3 This is the first motion for an extension of time for the Defendants to file Answer or
4 responsive pleading to the First Amended Complaint. The extension is requested in good faith
5 and is not for purposes of delay or prejudice to any other party.

6 DATED this 24th day of May, 2022.

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8 WRIGHT, FINLAY & ZAK, LLP

LAW OFFICE OF RANDAL R.
LEONARD, ESQ.

9 /s/ Ramir M. Hernandez

/s/ Randal R. Leonard

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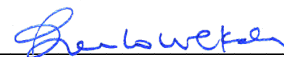
14 *Progressive-Nevada, Inc. and Citibank, N.A.,*

15 *as Trustee of the American Home Mortgage*

Investment Trust 2004-3, Mortgage Backed

Notes, Series 2004-3

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17 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: May 25, 2022